

Merom Brachman, *Chairman*
Mark A. Vander Laan, *Vice Chairman*
Megan C. Kelley
Mary M. Ross-Dolen
Jennifer L. Sheets
Christian H. Stickan



OHIO ETHICS COMMISSION
William Green Building
30 West Spring Street, L3
Columbus, Ohio 43215-2256
Telephone: (614) 466-7090
Fax: (614) 466-8368

Paul M. Nick
Executive Director

www.ethics.ohio.gov

OHIO ETHICS COMMISSION
MINUTES OF MEETING
MARCH 11, 2026

MEMBERS OF THE COMMISSION

Merom Brachman	Megan C. Kelley	Jennifer L. Sheets
Mary M. Ross-Dolen	Christian H. Stickan	Mark A. Vander Laan

CALL TO ORDER

The meeting of the Ohio Ethics Commission was called to order at 12:04 p.m. in Room 2 on Level 2 of the William Green Building, at 30 West Spring Street, in Columbus, Ohio.

ROLL CALL

The following Commission Members were present: Mr. Brachman, Ms. Ross-Dolen, Ms. Sheets, Mr. Stickan, and Mr. Vander Laan. Staff present: Executive Director Paul M. Nick; Deputy Director/General Counsel Jed Hood; Education and Communications Administrator Susan Willeke; IT and Financial Disclosure Administrator Brian Ring; HR & Fiscal Manager Alan Carlson; Chief Advisory Attorney Chris Woeste; Investigative Attorney Molly Bruns; Advisory Attorneys Melissa Riggins and Tim Gates; Investigative Assistant Shana Kaplan, and Assistant Attorney General Brittany Collins. Also present was Hamilton County Treasurer Jill Schiller, R.J. Mancini and Kevin Futryk with the County Treasurers Association of Ohio, and Renata Ramsini with the City of Columbus.

Commissioner Kelley was not present with an excused absence.

The Chairman introduced Commissioner Jennifer Sheets to the rest of the Commission and staff.

EXECUTIVE SESSION

MOTION by Mr. Vander Laan, seconded by Ms. Ross-Dolen, to go into Executive Session to discuss matters that are statutorily confidential, including pending litigation, updates on investigations and complaints, and the confidential financial disclosure report. Ms. Ross-Dolen, Mr. Stickan, Ms. Sheets, Mr. Vander Laan, and Mr. Brachman voted "yes." The motion was approved, and the Commission, pursuant to Section 102.06 and 121.22 of the Revised Code, went into Executive Session at 12:07 p.m.

The Commission returned to open session at 12:27 p.m.

PREVIOUS MEETING MINUTES

The Commission reviewed the draft minutes from the January 22, 2026, Commission meeting.

MOTION by Ms. Ross-Dolen, seconded by Mr. Vander Laan, that the Commission approve the minutes of the January 22, 2026, Commission meeting. Ms. Ross-Dolen, Mr. Stickan, Mr. Vander Laan, and Mr. Brachman voted yes. Ms. Sheets abstained. The motion was approved.

ADVISORY OPINIONS AND STATISTICS

The Chairman suggested that the Commission move the reconsideration request up on the agenda since the requester, Hamilton County Treasurer Jill Schiller, was present and wished to address the Commission. Ms. Schiller read a statement to the Commission that she prepared in which she presented her position regarding the advisory opinion that was issued to her in December 2025. Ms. Schiller noted that she believed that she could meet a public contract exception that is described in the advisory opinion. She also noted that she believed that the withdrawal requirement as described in the advisory opinion is too restrictive.

Regarding the public contract issue, Ms. Schiller mentioned that Hamilton County has a shortage of trained mediators, and the staff advisory opinion would prevent her from helping with the backlog. Regarding the conflict of interest issue, Ms. Schiller noted that the staff advisory opinion assumed that she could not withdraw from matters without recognizing that there may be matters from which she could withdraw by following existing procedures in her office. She also noted that her position is not a full-time position. Further, she stated that her authority is narrower than the advisory opinion assumed. She proposed that she could disclose her position with Hamilton County to potential clients in agreements with them, and that in the agreement she would describe her recusal requirements as County Treasurer.

Mr. Brachman asked Ms. Schiller about her background. Ms. Schiller stated that she is an attorney licensed in Pennsylvania and New Jersey and has worked for several non-profits. She also noted that she took the mediation courses as required by the Ohio Supreme Court.

Ms. Sheets asked about Ms. Schiller's potential role in domestic relations court. Ms. Schiller responded that she did parenting coordinator work, and Ms. Schiller described the nature of that work.

Mr. Nick stated that Mr. Hood prepared a memorandum for the Commission regarding this reconsideration request.

Mr. Hood summarized the advisory opinion that was previously issued to Ms. Schiller on December 22, 2025. He noted that the advisory opinion concluded that Ms. Schiller is prohibited from receiving payment for mediation services from Hamilton County unless she could meet an exception to the public contract prohibition. He also noted that the advisory opinion concluded that Ms. Schiller could not accept payment for services from a Hamilton County taxpayer, as the County taxpayers are interested in matters before the County Treasurer and Ms. Schiller would not be able to withdraw from matters that pose a conflict of interest due to the nature of her statutory duties as County Treasurer. However, he noted that

the advisory opinion concluded that Ms. Schiller is not prohibited from providing mediation services to residents of any other county in Ohio.

Mr. Hood recommended that the Commission deny the reconsideration request, noting that the advisory opinion adopted the analysis from an informal advisory opinion issued by the Commission in 2001 to a county treasurer.

Mr. Vander Laan indicated that there was some remoteness with respect to the potential for a conflict of interest and said he was presently inclined to grant the request, although he did not agree with all of Ms. Schiller's arguments. He then made a motion to take the matter under advisement for further review by the Commission. Ms. Ross-Dolen seconded the motion.

Prior to voting on the motion, Commission members discussed potential concerns. Ms. Sheets noted her concern about treating all counties the same, as some counties are smaller than others and operate under smaller budgets. Mr. Brachman indicated that the Advisory Committee should look at the relevant issues prior to the next Commission meeting.

All Commission members present voted in favor of the motion to take the matter under advisement for further review at the Commission's next meeting.

Mr. Brachman indicated that Ms. Sheets could serve on the Advisory Committee to fill a vacancy. Ms. Sheets agreed to serve on the Advisory Committee.

Mr. Nick then introduced the advisory and investigative charts and the advisory activity report. Mr. Woeste highlighted the opinion issued to Alan Lehenbauer, Law Director for the City of Maumee, who submitted the advisory opinion request on behalf of a city council member. Mr. Woeste noted that the advisory opinion deals with a data center development project, and Mr. Woeste also noted that advisory staff is receiving more calls related to data center projects.

Mr. Brachman asked whether the advisory opinion concluded that there was not a conflict. Mr. Woeste responded that, under the Commission's precedents, in-laws are not family members unless they live together, and therefore the advisory opinion concluded that the city council member is not prohibited from participating in the matter that may affect the council member's in-law.

EXECUTIVE DIRECTOR'S REPORT

Mr. Nick updated the Commission on the recent hearing at the Joint Committee on Agency Rule Review (JCARR) where the Commission was asked to revise OAC 102-5-05, the administrative rule that authorizes the Commission to determine public officials and employees are required to file financial disclosure. Mr. Nick noted that the Commission has been operating for decades under the rule allowing the Commission to make those determinations by vote, noting that this rule was approved by JCARR in 1977 and again in 2001 and 2012. However, he reported that one of the co-chairs of JCARR stated that the Ohio Revised Code was recently amended to grant JCARR the authority to review whether an agency is relying upon a principle of law or policy that JCARR believes should be supplanted by its restatement in a rule. Mr. Brachman noted that JCARR acknowledged that rule authority, but they want to ensure all regulatory boundaries have been respected.

Ms. Ross-Dolen inquired why some financial disclosure requirements are determined by the General Assembly and some by the Ethics Commission. Mr. Nick explained that the Ohio Revised Code (as written by the General Assembly decades ago) requires persons in some public positions to file by statute (such as school superintendents and treasurers, directors and assistant directors of state agencies, and some elected officeholders) while the Commission was granted the authority to determine filing requirements for other public officials subject to its authorities, such as members of boards and commissions. He added that the timing of this conversation is helpful as the Commission is required to review its rules every five years and this rule is due for review in 2027. Mr. Nick stated that he intended to follow up with the JCARR executive director and report back to the Commission at its next meeting.

LEGISLATION UPDATE

Mr. Hood reviewed the legislative report in the packet and highlighted several bills that have seen recent activity in the General Assembly, including HB 113 which requires certain public officials to file financial disclosure statements with the Commission. Mr. Brachman observed that this bill as well as the recent JCARR hearing underscore that financial disclosure is an effective mechanism in maintaining propriety in government.

Mr. Hood also pointed out SB 331 which would allow specific groups of public employees to accept gratuities, such as public golf course personnel. He also reported that he is monitoring several bills that would create new boards/commissions and subsequent potential financial disclosure filing requirements.

Mr. Hood also mentioned a recent bill not included in the packet report, SB 268, which would require each state agency that adopts administrative rules to disclose specified information to the Ohio Ethics Commission regarding the agency's involvement with regulatory-focused, non-governmental organizations. Mr. Nick stated that the bill appears to focus on private organizations that draft model administrative rules intended for adoption by state agencies.

PUBLIC EDUCATION AND INFORMATION

Ms. Willeke reviewed the material as shown in the packet highlighting several recent speeches designed for those new to public office or public service. Two sessions hosted by the Ohio Municipal League attracted nearly 200 elected officials to each session.

FINANCIAL DISCLOSURE STATISTICS REPORT/COMPLAINT REPORT

Mr. Ring reviewed the material as shown in the packet pointing out that the FDS deadline for May 5, 2026 candidates is April 6 while the deadline for write-in candidates is April 15.

He also updated the Commission on the FDS collections project. Staff have reviewed all collection cases and found that 500 cases contained social security numbers which were then prioritized. The 75 cases with multiple matters represent more than 235 of the total 500 cases. He also reported that some tax offset money has already been collected.

MOTIONS

RC 102.07 Release of Files

MOTION by Mr. Stickan, seconded by Ms. Sheets, to authorize staff to share confidential complaint documents in Case No. 23-FDS-1207-018 with the Attorney General's Office to assist in their collection efforts. The motion passed unanimously.

Late Fee Waivers:

MOTION by Ms. Ross-Dolen, seconded by Mr. Vander Laan, to waive the financial disclosure statement late fees for the individuals listed in the packet report. The motion passed with Mr. Stickan abstaining.

Complaints to be Dismissed:

MOTION by Ms. Sheets, seconded by Ms. Ross-Dolen, to dismiss the financial disclosure complaints filed against the individuals listed in the packet report, for good cause shown. The motion passed with Mr. Stickan abstaining.

Referrals for Collections:

MOTION by Ms. Ross-Dolen, seconded by Ms. Sheets, to refer to the Attorney General's Office for collections the individuals listed in the packet report. The motion passed unanimously.

DATE OF FUTURE MEETINGS

The Commission scheduled its next meeting for Wednesday, April 29, 2026, at 11:30 a.m., with the Investigative Committee meeting at 10:30 a.m.

The meeting was adjourned at 1:35 p.m.

These minutes are respectfully submitted by:

/s/ Paul M. Nick

Paul M. Nick
Executive Director